

Comments on EPA's Revisions to RI Section 10

Overall Comments

- Removal of pertinent information from Section 10 compromises the utility of the RI (e.g, to provide the FS with key information). The executive summary is written for the non-technical person to quickly grasp the PH conditions, which is fine. However, the CSM is where the technical reader sees the pieces together and checks to make sure they work together and comes to the opinion that there is a sound understanding of the PH system and the science is defensible. With the information removed, the technical reviewer no longer sees all the pieces together in the CSM.
- All references to natural recovery and monitored natural recovery have been deleted. The CSM should explain that natural recovery is a significant issue to be addressed during the evaluation of cleanup alternatives in the FS.
- This section has been so heavily edited it no longer provides a comprehensive story that one could read separately from the RI and get the full picture of the site, and the impacts of the chemicals in sediment.
- Details on receptors and exposures are gone. A large part of the story of a site is what and how people and critters use the site (live, swim, fish, work), and what are the pathways that they can be exposed to chemicals. These are important elements to a CSM because they are the underlying reasons that remedies would be required. The risk assessment summaries provided in the Conclusions Section are results do not emphasize the relevance of the various pathways and exposures.
- Discussion of historical pathways was nearly completely eliminated from this CSM. This is a significant omission because of the large contribution from historical sources compared to current sources. The Historical Source section is also out of balance with Current Sources section which focuses only on pathways.
- The loading analysis was nearly completely eliminated in the IC sections.
- The revised Conclusions Section appears to be copied from various sections of the RI and risk assessment and is not focused on the CSM.

Recommend retaining the following text that was deleted:

- Physical setting information (deleted from the new Sections 10.1 and 10.1.1.1)
- Nature and extent/distribution discussions including surface versus subsurface chemical comparison.
- Migration Pathways and historical versus current perspective – Section 10.3.1.1
- General discussion of external loading including atmospheric, groundwater, and stormwater. Stormwater is discussed inconsistently in EPA draft being mentioned in places and not others.
- Removal, in general, of the risks identified from individual ICs undermines the value of the CSM as a foundation for the FS and seems likely to result in confusion, especially for those readers who will skip to the last chapter rather than plow through the risk assessments in detail. Tying the distribution of chemicals to the risks presented at the site is an important function of the CSM.
- Most of the discussions of uncertainty in section 10.
- Discussion of chemical signatures (e.g., PAH).
- Text that indicated that the entire reach is generally depositional or “no net elevation change.” .

- Text that summarized the 7-year empirical data set for bed elevation changes and no change or scour identified between RM 5-7.
- Text that stated surface sediment concentrations are significantly greater than surface water or sediment trap concentrations.
- Text that indicated higher historic sources vs. current sources, and that higher concentration sediment is now covered with lower concentration sediment.
- Text discussing internal fate and transport processes relevant to MNR, EMNR, and capping.
- Section 10.2.4:
 - Text related to PAHs being readily metabolized.
 - Text related to degradation of PAHs.
 - Text was changed to specifically state there is indication of downstream transport of PAHs rather than stating that the concentration profiles suggest a possible link.
 - Text related to physical processes that impact observed contaminant distributions (e.g. navigation channel maintenance depths and associated dredging).
 - Text was deleted related to stormwater sources of PAHs from industrial outfalls, which removes a key component of the CSM.
 - Text that provides the basis for using Indicator Chemicals, such as cPAHs, and identifies benthic risk as the primary risk driver for PAHs.

Specific comments

- 10.2 states that the “C” Panels identify known upland sources. EPA deleted Table 4.2-2 as the reference for this material. Will some reference be provided for the information? Is the information changing? The first paragraph of Section 10.3 needs to include stormwater.
- Text in 10.2 clarified that Section 10 and the RI generally did not define the complete universe of potential current and historical sources to Portland Harbor. This text supports EPA’s issuance of general notice letters and the future issuance of special notice letters for remedy implementation and should be retained in the RI.
- Text is inconsistent in content of discussion of the various ICs. For example, EPA deleted all text about upriver sources of PAHs, but included a new statement that “no upriver watershed sources of BEHP have been identified.” Same issue with chromium.
- Overall, the text, tables and figures of the revised draft need to be gone through to be sure stormwater is being treated consistently.
- There is a problem in the characterization of surface water quality - e.g., EPA’s revised text states increases between upstream and downstream boundaries, which is an oversimplification. These overgeneralizations do not create an accurate assessment of the harbor.
- 10.3 comment: Vinyl chloride is not associated with Gasco. Please remove this comment or provide correct source attribution.
- 10.2.9.2: text identifies companies, not “industries.”
- 10.3 summary of risk assessment findings includes new text highlighting one exposure risk scenario without discussion of the exposure assumptions.